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The Honorable Robert A. Hampton
Chairman, Civil Service Commission
1900 E Street, N. W.
Washington, D. C. 20415

SUBJECT: Comments on the Job Evaluation and Pay Review Task Force Proposals

Dear Mr. Hampton:

I have three basic comments on the Job Evaluation and Pay Review Task Force proposals.

First, I have serious doubts concerning the Task Force's concept of the role of Federal managers and the extent to which they should be delegated authority to classify positions. In most government operations, profit and loss accountability cannot approach that which is possible in the private sector. Also the Task Force focuses upon management at a level which cannot possibly exercise the final authority for decisions on selection, classification, and pay of personnel or the budgetary responsibility for financing their programs. To place such authority at the level proposed would soon fragment an agency and destroy the basis for an approach toward developing and maintaining a career work force.

Second, I believe that the Administrative, Professional, and Technical Evaluation System should be extended to include the Executive levels contained in the Executive Evaluation System. The Executive levels are a normal extension upward of APTES levels. In addition, the myriad of special occupational systems should be included in the APTES System with variations in pay for different occupations as required, based possibly on the system presently used for special rates. This would include all the positions under one basic system except those under the COMOT Evaluation Plan. Such a system, adequately covered by benchmark positions, should minimize disparities in the classification process.

Third, I question the practicability of locality rates for COMOT employees in the Washington area, since there are no major industrial employers for rate comparison.

I would like to commend the Task Force for producing an exceptional amount of work in such a relatively short time. It has been a worthwhile endeavor.

Sincerely,

Harry B. Fisher
Director of Personnel

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